



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA

TERRILL Goods SR.

# 83747869

(Enter above the full name of the plaintiff or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 1:24-cv-00250  
(Number to be assigned by Court)

James A. Dailey, et. al.,

(Enter above the full name of the defendant or defendants in this action)

**COMPLAINT**

**I. Previous Lawsuits**

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes \_\_\_\_\_ No ✓

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Court (if federal court, name the district; if state court, name the county);

\_\_\_\_\_

\_\_\_\_\_

3. Docket Number: \_\_\_\_\_

4. Name of judge to whom case was assigned:

\_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

\_\_\_\_\_

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

II. Place of Present Confinement: F.C.I. McDavid

A. Is there a prisoner grievance procedure in this institution?

Yes / No \_\_\_\_\_

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes / No \_\_\_\_\_

C. If you answer is YES:

1. What steps did you take? wrote a few complaints

on the kiosk. Complaints can be suppressed PLEASE.

2. What was the result? Staff refused to address  
my complaints truthfully.

D. If your answer is NO, explain why not: \_\_\_\_\_

\_\_\_\_\_

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Tennill Goossen #83747509

Address: F.C.I. McDavid Wetch, WV.

B. Additional Plaintiff(s) and Address(es): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: James A. Daley

is employed as: Head Jailor / Fed. Lawyer?

at Campbell County Detention Center, Newport, Ky.

D. Additional defendants: 3. Deputy Turnea, 2. Deputy Hunt,  
4. Deputy Hamilton, 5. Deputy Tyler, 6. Sgt. Hawkins,  
1. Sgt. Dorgan (First Hand Knowledge)

#### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

1. During the month of August 2022 I tested positive for Covid-19. As a result instead of getting medical attention me and another inmate were placed in isolation for 4 days. Adding to the dangerous policy I missed an important pre-trial court date. All could have been avoided being the staff has a 15 min. C-19 test. But instead of using tests on "new arrivals" jail staff allowed inmates to pass thru untested. These negligent actions almost killed me.

IV. Statement of Claim (continued):

2. James A. Daley ~~also~~ violated Attorney/Client privilege.

During trial in Dec 2022, AUST admitted that Daley gave her unlimited, unlawful, and illegal access to my phone calls and texts. SEE: (Total Transcripts pg. 1018). Staff denied this allegation.

3. Daley retaliated by means of "cruel and unusual punishment"

After a final Sent. hearing Daley gave staff orders to put me on "High Risk" suicide watch on 5/24/23. After being tipped off about this filing and implicating Daley in a conspiracy for "The Hobbs Act Extortion under color of Right." 8<sup>th</sup> Amend. protection ignored!!!

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Monetary Damages are applicable for all 3 of these

refractory deprivations of my constitutional rights. Each one

of them are listed via transcript on medical rec. ~~██████████~~

As a result

~~██████████~~ these acts have caused permanent mental

anguish. Punitive Damages are mandatory because acts 2 and 3

were done ~~intentionally and maliciously~~ Damage Awards compensate

injuries that are caused by the deprivation of const. rights.

" " " Mr. Daley and other ~~conspirator~~ behavior was callous and reckless.

Compensatory damages are also needed being Daley ~~colluded~~ with

V. Relief (continued)):

AUSA's. These officials acting under color of law,  
caused the deprivation of federal rights. Daley in his individual and  
official capacity even now policies And customs that played a  
part in violating federal law. I'm seeking 35 million  
dollars in damages. Punitive damages / compensatory damages are requested.

VII. Counsel

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

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B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes \_\_\_\_\_ No

If so, state the name(s) and address(es) of each lawyer contacted:

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If not, state your reasons: I would like the court to  
appoint counsel to aide in attaining court/ <sup>Medical</sup> E records

C. Have you previously had a lawyer representing you in a civil action in this court?

Yes \_\_\_\_\_ No

If so, state the lawyer's name and address:

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Signed this 2nd day of May, 2024.

Tenille Goods Co.

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Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/2/24.  
(Date)

  
Signature of Movant/Plaintiff

\_\_\_\_\_  
Signature of Attorney  
(if any)